UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA

v.

No. 1:23-cr-00103-JAW

ANGELO CASTIGLIOLA

GOVERNMENT'S MOTION TO MODIFY JUDGMENT

The United States of America moves to amend the Judgment in this case (Dkt. 80) to add a condition of supervised release. Specifically, the Government requests that the Court add a condition that the Defendant have no contact with either of the named victims in this case, K.G. and M.G., with the exception of legal filings. In support of this Motion, the Government states the following:

On January 21, 2025, the Defendant was sentenced to 18 months in prison, followed by three years of supervised release. In addition, the Court ordered the Defendant to be subject to standalone monitoring for the first year of his supervised release. The standalone monitoring will include exclusion zones of the victims' residences and places of work.

On January 23, 2025, the parties learned that the United States Marshals Service calculated the Defendant's good time credit and determined that he could be released immediately. Accordingly, the Defendant will be released later today, and he will begin his term of supervised release immediately.

The United States Probation Office has informed the Government that in order to properly supervise the Defendant and monitor the exclusion zones, it would be helpful and appropriate to have a provision that the Defendant have no contact with K.G. or M.G. The undersigned has spoken with defense counsel, and both parties were under

the impression that the Judgment already contained such a provision. Upon review of the Judgment, there is no such condition, and therefore the Government respectfully requests that the Court add it.

Defense counsel has advised that his client does not oppose this Motion.

WHEREFORE, the Government respectfully requests the Court to amend the Judgment to add the condition of supervised release set forth above.

Dated: January 23, 2025 Respectfully submitted,

> DARCIE N. MCELWEE United States Attorney

/s/ Shira Furman Assistant U.S. Attorney 100 Middle Street Portland, Maine 04101 (207) 771-3252 Shira.Furman@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, I electronically filed **GOVERNMENT'S MOTION TO MODIFY JUDGMENT** with the Clerk of Court using the CM/ECF system which will send notifications of such filing(s) to all counsel of record.

DARCIE N. MCELWEE United States Attorney

<u>/s/ Grace Herrick</u> Grace Herrick Paralegal Specialist

On behalf of: Shira Furman

Assistant United States Attorney

U.S. Attorney's Office

100 Middle Street Plaza, East Tower

Portland, ME 04101 (207) 780-3257

Shira.Furman@usdoj.gov